

IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF OHIO
EASTERN DIVISION

SEAN DECRANE <i>Plaintiff,</i> v. EDWARD J. ECKART, <i>et al.</i> , <i>Defendants.</i>	Case No. 1:16-cv-02647 Judge Christopher A. Boyko Magistrate Judge William H. Baughman, Jr.
PLAINTIFF SEAN DECRANE'S MOTION TO CONTINUE EVIDENTIARY HEARING	

Plaintiff Sean DeCrane respectfully moves the Court to continue the evidentiary hearing scheduled set for Friday, February 22, 2019 because of significant scheduling conflicts. *See* Doc. #107. DeCrane and his counsel recognize the importance of this hearing, and request this continuance to ensure their full, focused participation, which the current hearing date does not allow.

The Court's order setting the hearing identifies Brian Bardwell as one of the two key witnesses from whom the Court expects to hear testimony. Mr. Bardwell volunteered as a law clerk at the City of Cleveland for several weeks during his post-1L summer. He is scheduled to take the three-day Ohio Bar Examination on February 26 through 28.¹ He has set aside time to focus on exam preparation during the weeks before the test. And Chandra Law firm managing partner Subodh Chandra, counsel of record, must accompany his mother to cancer treatment at the Cleveland Clinic on February 22.

¹ Mr. Bardwell sat for and passed the DC bar exam in July. His swearing-in has been delayed by the government shutdown.

DeCrane therefore requests a short continuance, and asks the Court to set the evidentiary hearing for a date and time when all counsel and witnesses can participate. Undersigned counsel is scheduled to begin a week-long trial on April 8, and has other significant obligations including an aggressive deposition and briefing schedule that make scheduling difficult. Plaintiff DeCrane has intermittent international travel scheduled. Given the potential complexity of the scheduling issues, DeCrane respectfully requests that the Court personnel reach out to counsel to coordinate a mutually agreeable hearing date. Given the stakes, it is important that the hearing date is appropriate for all parties and witnesses involved.

Respectfully submitted,

/s/ Subodh Chandra

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CERTIFICATE OF SERVICE

I certify that the above document was filed on February 1, 2019 using the ECF system, which will send notification to all counsel of record.

/s/ Subodh Chandra

One of the attorneys for Plaintiff Sean DeCrane